

WILLIAM A. ISAACSON (*Pro hac vice*)
(wisaacson@bsfllp.com)
STACEY K. GRIGSBY (*Pro hac vice*)
(sgrigsby@bsfllp.com)
NICHOLAS WIDNELL (*Pro hac vice*)
(nwidnell@bsfllp.com)
BOIES SCHILLER FLEXNER LLP
1401 New York Avenue, NW
Washington, DC 20005
Tel: (202) 237-2727; Fax: (202) 237-6131

RICHARD J. POCKER #3568
(rpocker@bsfllp.com)
BOIES SCHILLER FLEXNER LLP
300 South Fourth Street, Suite 800
Las Vegas, NV 89101
Tel: (702) 382-7300; Fax: (702) 382-2755

DONALD J. CAMPBELL #1216
(djcc@campbellandwilliams.com)
J. COLBY WILLIAMS #5549
(jcw@campbellandwilliams.com)
CAMPBELL & WILLIAMS
700 South 7th Street
Las Vegas, Nevada 89101
Tel: (702) 382-5222; Fax: (702) 382-0540

*Attorneys for Defendant Zuffa, LLC, d/b/a
Ultimate Fighting Championship and UFC*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Cung Le, Nathan Mr. Quarry, Jon Fitch, Brandon
Vera, Luis Javier Vazquez, and Kyle Kingsbury,
on behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

Defendant

No.: 2:15-cv-01045-RFB-(PAL)

**DECLARATION OF NICHOLAS A.
WIDNELL IN SUPPORT OF ZUFFA,
LLC'S MOTION TO SEAL
PORTIONS OF ZUFFA, LLC'S
REPLY TO PLAINTIFFS'
OPPOSITION TO ZUFFA'S MOTION
FOR PARTIAL SUMMARY
JUDGMENT AS TO PLAINTIFF
NATHAN QUARRY ON STATUTE
OF LIMITATIONS GROUNDS AND
RELATED DOCUMENTS**

1 I, Nicholas A. Widnell, declare as follows:

2 1. I am an attorney admitted to practice before the courts in the District of Columbia and
3 am admitted Pro Hac Vice to practice before this Court. I am Counsel in the law firm Boies Schiller
4 Flexner LLP, and counsel to Defendant Zuffa, LLC (“Zuffa”) in this case.

5 2. I make this declaration in support of Zuffa’s Motion to Seal Portions of Zuffa’s Reply
6 to Plaintiffs’ Opposition to Zuffa’s Motion for Partial Summary Judgment as to Plaintiff Nathan
7 Quarry on Statute of Limitations Grounds And Related Documents (“Motion to Seal”).

8 3. Based on my review of the files and records in this case, I have firsthand knowledge
9 of the contents of this declaration and could testify thereto.

10 4. Zuffa seeks to file under seal a limited portions of Zuffa’s Reply to Plaintiffs’
11 Separate Statement of Undisputed Material Facts in Support of Their Opposition to Zuffa, LLC’s
12 Motion for Partial Summary Judgment (“Zuffa’s Reply SSUMF”).

13 5. Federal Rule of Civil Procedure 26(c) provides that the Court may “issue an order to
14 protect a party of person from annoyance, embarrassment, oppression or undue burden or expense”
15 by “requiring that a trade secret or other confidential research, development, or commercial
16 information not be revealed or be revealed only in a specific way.” In addition, documents filed in
17 connection with a summary judgment motion may be sealed if there are “compelling reasons” to seal
18 those documents. *Kamakana v. City & Cty. of Honolulu*, 447 F.3d 1172, 1179 (9th Cir. 2006)
19 (citation omitted).

20 6. I understand that as a private company, Zuffa does not publicly disclose information
21 relating to profitability, revenue, and other related information. I also understand that Zuffa
22 zealously guards its private profitability, revenue, and related information and that disclosure of that
23 information would very likely provide competitors with insights they could use to gain damaging
24 and unfair competitive advantages over Zuffa.

25 //

26 //

27 //

28 //

1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing facts are true and correct. Executed this 1st day of May, 2017, in Washington, DC.

3
4 /s/ Nicholas A. Widnell

5 Nicholas A. Widnell
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28